



Antalya Airport Expansion Project

Environmental and Social Action Plan

March 2025

Environmental and Social Action Plan

No	PR/PS No.	Requirement	PR/PS Subheading	Action	Responsibility	Timeline	Target and Evaluation Criteria for Successful Implementation	Critical Items
1.2-1	1	EBRD PR1 IFC PS 1 Good Practise	Environmental and Social Management System (ESMS)	Continue to implement ISO 9001, ISO 14001, ISO 45001, ISO 50001 requirements	FTA	First five years of operation – reported annually	Certifications for management systems and Annual Environmental and Social Reports (AESR)	
1.2-3	1	EBRD PR1 IFC PS 1 Good Practise	Environmental and Social Management System (ESMS)	Adopt Environmental and Social Management Plans and Procedures for operational phase.	FTA	30/04/2025	Environmental and Social Management Plans and Procedures	
1.4	1	EBRD PR1 IFC PS 1 Good Practise	Environmental and Social Management Plan	Review the overarching Environmental and Social Management Plan (ESMP) for operation phase	FTA & External Consultant	30/04/2025	ESMP for operation phase	
1.5-5	1	EBRD PR1 IFC PS 1 Good Practise	Organisational Capacity and Commitment	Ensure qualified E&S personnel are employed and sufficient financial resources are allocated by FTA at operational stage for implementation of this ESAP and detailed recommendations of ESIA, including at least two additional full time specialists hired for full execution of major deliverables such as SLIP via SLIP implementation	FTA	30/06/2025 (Condition of Second Disbursement) (or June 30, 2025, if earlier)	Employment/appointment records Organizational chart (including SLIP implementation committee and the VNIP implementation team); specifying functions, task allocation, associated decision-making	Critical

				committee and VNIP via VNIP implementation team.			process and reporting lines to the Borrower	
1.6-1	1	EBRD PR1 IFC PS 1 Good Practise	Project Monitoring and Reporting	Review the procedure on tracking EHS non-compliances for the operation phase, following up, and analysing trends and include in the reporting to Lenders	FTA & ATS	31/01/2025	Non-compliance track lists	
1.6-2	1	EBRD PR1 IFC PS 1 Good Practise	Project Monitoring and Reporting	Implement Environmental and Social Monitoring Plan for construction phase.	ATS	During construction	Semi-annual Environmental and Social Monitoring Reports for construction	Critical
1.6-3	1	EBRD PR1 IFC PS 1 Good Practise	Project Monitoring and Reporting	Prepare and submit to the Lenders Environmental and Social Report on the status of this ESAP implementation and ongoing Environmental Health Safety, Social (EHSS) performance and progress on supplementary implementation plan for corrective actions for land acquisition	FTA	During operation	AESR	
1.6-5	1	EBRD PR1 IFC PS 1 Good Practise	Project Monitoring and Reporting	Review the Environmental and Social Monitoring Plan for operational phase. Plan to be reviewed and approved by the Independent Environmental and Social Consultant (IESC) Provide the Environmental and Social Monitoring Plan for the operational phase per approved template to the	FTA	01/03/2025 31/03/2026 for verification of implementation	Final Environmental and Social Monitoring Plan, AESR and IESC report	

				satisfaction of Lenders.				
1.7-1	1	EBRD PR1 IFC PS 1 Good Practise	Permitting	Prepare and keep a Legal Compliance Register to ensure compliance with national legislation and receipt of all relevant permits and approvals. In particular, secure i) permits for new groundwater wells required for operation, ii) the updated environmental permit for operation of the expanded WWTPs and iii) temporary waste storage permit for the waste storage areas to be built after the expansion.	DHMI & FTA & ATS	31/03/2026 for verification of implementat ion	Legal Compliance Register, Permits and approvals.	
1.7-2	1	EBRD PR1 IFC PS 1 Good Practise	Permitting	Secure environmental permits/exemption decision for the permit for concrete batching plants (CBPs)	ATS & FTA	28/02/2025	Environmental permit for CBPs	
1.7.7	1	EBRD PR 1 IFC PS1 Good Practise	Identification of Risks and Impacts	Perform an E&S screening study to meet PS-PR requirements on Phase II CAPEX (construction of a new air traffic control tower, new technical building and new transmission lines) and any other Associated Facilities within FTA's legal or contractual scope, to supplement the existing ESIA and propose updates to the Management Plans, where necessary. Apply construction ESMS and updated MPs, and any other requirements applicable including any	FTA & EPC contractor	Prior to Phase II construction During Phase II construction	E&S Screening Study Updated MPs AESR and IESC report	

				additional mitigation measure might be identified by the supplemental E&S study.				
1.7.8	1	EBRD PR 1 IFC PS1 Good Practise	Identification of Risks and Impacts	<p>Perform an E&S screening study to meet PS-PR requirements on the construction activities of the new access road within the airport boundary.</p> <p>To the extent possible, cooperate with DHMI and inform them on ESMS and management plans (MPs), and any other requirements applicable including any additional mitigation measure might be identified by the E&S screening study.</p>	DHMI, FTA & EPC contractor	<p>Prior to the new access road construction</p> <p>During new access road construction</p>	Meeting minutes and documentation exchange with DHMI E&S Screening Study AESR and IESC report	
2.1-2	2	EBRD PR2 IFC PS2		Review and update the Contractor Management Plan for the operations phase. This will also cover methodology and frequency of internal audits and monitoring of contractors by an adequately qualified team on labor and OHS to ensure compliance with national law and PS2/PR 2.	FTA	30/04/2025	Contractor Management Plan for operations	Critical
2.1-3	2	EBRD PR2 IFC PS2		Conduct an external labour and working conditions audit including occupational health and safety in line with PS/PR2 and worker accommodation guideline of IFC and EBRD by	FTA	<p>Q2 2025</p> <p>(exact date to be noted as per the schedule)</p>	Labour and Working Conditions Audit Report	

				independent external labour experts to be engaged by LTA and provide outcomes and report to Lender. This audit shall be conducted during the demobilization phase of the project and cover a representative sample of contractors. Corrective actions to meet any potential PS/PR2 gap identified by the audit will be implemented in due course			
2.5	2	EBRD PR2 IFC PS2 Guidance Note on Employee Grievance Mechanism		Review and update the inductions for the new contractors and the employees to include the grievance mechanism	FTA & ATS & operational contractors	31/03/2025	Grievance records, Complaint response times, Induction and Training records, participation lists, posters and other means of communication tools, Monthly audit reports, Semi-annual and annual monitoring report, external labour audit, and IESC report
2.6-3	2	EBRD PR2 IFC PS2 Labour Law (4857)		In the case where the suppliers are found to be non-compliant with PS/PR2, FTA will plan and deliver on site audits for primary suppliers of ongoing goods and services	FTA	During operation	Revised Supplier management policy/vendor evaluation forms Written commitments (in contracts or stand-alone declarations)

4.8-3	4	EBRD PR2 IFC PS2	Accidents and Incidents	Improve near miss reporting by raising awareness of employees, making available hard copy near miss forms for construction and operation	FTA & ATS	30/06/2025	Accident/incident procedure, Accident and near miss tracking list	
4.8-4	4	EBRD PR2 IFC PS2	Accidents and Incidents	Establish an incident/accident procedure for operation	FTA	31/03/2025	Accident/incident procedure, Accident and near miss tracking list	Critical
4.10-1	4	EBRD PR2 IFC PS2	Safe Systems of Work	Establish a permit to work procedure and related permit forms, such as working at height, hot works, confined space work, excavation works and a LOTO procedure for operations	FTA	31/03/2026	Permit to work procedures	Critical
4.13-2	4	EBRD PR 2 IFC PS 2	Medical Surveillance	Establish an operation contractors and subcontractors' medical surveillance program during operation (especially the waste collection and segregation contractor)	FTA	31/03/2025	Medical surveillance track list	
4.15-1	4	EBRD PR2 IFC PS2	Industrial Hygiene	Develop workplace monitoring plan to cover the major exposure risks (e.g. illumination, thermal comfort, dust exposure, indoor gas exposure, vibration and indoor noise level) for operation	FTA	30/04/2025	Monitoring plan, AESR and IESC report	
3.1-1	3	EBRD PR3 IFC PS3 Good Practice	Resource Efficiency	Identify and monitor KPIs associated with resource consumption, including but not limited to fuel and water consumption and regularly monitor them for operational activities	FTA	30/04/2025	KPI tracking records for operation activities	

3.2-2	3	EBRD PR3 IFC PS3	Air	In line with Lenders' standards, develop an operational Air Quality Management Plan for the emissions generated by trigeneration and heating system during operation phase Verify the implementation of the plan after one year of operation	FTA	30/06/2025 31/03/2026	Air Quality Management Plan for operation Emission reports as part of monitoring reports of IESC and AESR	
3.2-7	3	EBRD PR3 IFC PS3	Air	Ensure management procedures for operation of the new fuel farm are in place including measures to control VOC emissions,	FTA to initiate the process and cooperate with DHMI & fuel farm operators to undertake VOC analysis	30/06/2025	Evaluation of the effectiveness of the measures taken, Air Quality Management Plan for operation	
3.2-8	3	EBRD PR3 IFC PS3	Air	Audit new fuel farm operations against good international practice to limit VOC emissions	FTA to initiate the process and cooperate with DHMI & fuel farm operators to undertake VOC analysis	31/03/2026	Evaluation of the effectiveness of the measures taken, Air Quality Management Plan for operation phase	
3.2-9	3	EBRD PR3 IFC PS3	Air	In line with Environmental and Social Monitoring Plan for operational phase, Undertake VOC analysis at the proposed fuel farm to monitor impacts at nearby receptors	FTA to initiate the process and cooperate with DHMI & fuel farm operators to undertake VOC analysis	31/03/2026	VOC analysis results within AESR	
3.3-1	3	EBRD PR3 IFC PS3	Greenhouse Gases	Adopt a GHG Calculation Procedure to ensure that FTA continues calculating,	FTA	30/06/2025	GHG calculation procedure, annual GHG footprint	

				monitoring and publicly disclosing GHG emissions annually in line with ACA scheme and IFC guidelines			reporting in AESR	
3.4-1	3	EBRD PR3 IFC PR3	Climate Change	Inform DHMI to consider extreme weather conditions within its operations and future projections, including for flight scheduling and payload restrictions	FTA & DHMI	30/06/2025	Heat Management Plan, Asset Inspection Plan	
3.4-2	3	EBRD PR3 IFC PR3	Climate Change	Revise emergency planning and disaster management processes for staff, passengers and equipment to take account of increased failure rate of mechanical and electric equipment under increased maximum temperatures	FTA	30/06/2025	Emergency Response Plan, Water Management Plan, Heat Management Plan Asset Inspection Plan	
3.4-4	3	EBRD PR3 IFC PR3	Climate Change	Develop heat management plans, including passive ventilation and identification or creation of cool refuges to be used for staff or passengers as part of first aid response to heat stress events from combined increased heat and humidity	FTA	30/06/2025	Heat Management Plan	
3.4-5	3	EBRD PR3 IFC PR3	Climate Change	Develop inspection regimes following extreme weather events	FTA & DHMI	30/06/2025	Asset Inspection Plan	
3.4-7	3	EBRD PR3 IFC PR3	Climate Change	Revise Operational Water Management Plan to account for increased drought risk and maximising water efficiency of the airport	FTA & DHMI	30/06/2025	Water Management Plan	
3.4-8	3	EBRD PR3 IFC PR3	Climate Change	Consult with other stakeholders (DHMI and airlines) on additional	FTA	30/06/2025	Emergency Response Plan, Water	

				adaptation measures in the ESIA and pursue adoption/implementation			Management Plan, Heat Management Plan, Asset Inspection Plan	
3.5-1	3	EBRD PR3 IFC PS3 European Noise Directive Guidelines for Community Noise (WHO, 1999) ICAO/EU balanced approach ICAO Document 9829 Guidance on the Balanced Approach to Aircraft Noise Management , 2008	Noise	<p>i) demonstrate efforts to cooperate with DHMI to clarify role and responsibilities on noise management</p> <p>ii) prepare a draft Noise Management Plan (NMP) to meet PS-PR requirements, aiming for DHMI's further development and input (in line with ICAO Balanced approach), including proposed mitigation measures for sensitive receptors in line with national regulations, Lenders' standards and Good International Industry Practice (GIIP), and communicate progress made on noise abatement via the project's Stakeholder</p>	FTA & DHMI	<p>31/03/2025 (Condition of First Disbursement)</p> <p>31/03/2025 (Condition of First Disbursement)</p> <p>31/09/2025 or a later date communicated by DHMI in written</p>	<p>i) Official letter sent to DHMI aimed at enhancing the cooperation on noise management. Documentation of key related exchanges with DHMI and minutes of meetings carried out with DHMI, if DHMI agreed to such meeting.</p> <p>ii) Draft NMP completed to the extent that can be reasonably expected of FTA, with requirements set out for DHMI input to complete an ICAO-aligned NMP.</p> <p>iii) Operational NMP</p>	Critical

				<p>Engagement Plan (SEP).</p> <p>iii) FTA will disclose the Noise Management Plan once approved by DHMI or by the proposed timeline if no input from DHMI is provided. The Voluntary Noise Insulation Program expected to be finalized and disclosed before the NMP itself and will be annexed to the NMP.</p>				
3.5-2	3	<p>EBRD PR3 IFC PS3 European Noise Directive Guidelines for Community Noise (WHO, 1999) ICAO/EU balanced approach, ICAO Document 9829 Guidance on the Balanced Approach to Aircraft Noise Management , 2008</p>	Noise	<p>i) Design a draft Voluntary Noise Insulation Program (VNIP) to meet PS-PR requirements to mitigate the night-time noise disturbance at sensitive receptors and the day-time noise disturbance at hypersensitive receptors, such as schools and hospitals.</p> <p>ii) FTA will disclose the VNIP to affected communities and undertake tailored, impact-based outreach activities to support implementation, and deliver the noise insulation implementation program</p> <p>iii) Annual Progress Report</p>	<p>FTA in cooperation with DHMI and relevant local authorities</p>	<p>31/03/2025 (Condition of First Disbursement) – Draft VNIP</p> <p>Condition of Second Disbursement (or June 30, 2025, if earlier) – Final VNIP</p> <p>30/06/2025</p> <p>annual</p>	<p>i) Draft VNIP</p> <p>Final VNIP</p> <p>ii) Disclosed documents</p> <p>iii) Reporting on outreach based on agreed targets (No. of household reached, applying, entering the program, completing the insulation work)</p>	Critical

				of the Voluntary Noise Insulation Program			FTA Annual Progress Report (including outreach target and results during each phase of the VNIP), AESR, IESC report (including close out status report at the end of the 5th year)	
3.5-3	3	EBRD PR3 IFC PS3 European Noise Directive Guidelines for Community Noise (WHO, 1999) ICAO/EU balanced approach, ICAO Document 9829 Guidance on the Balanced Approach to Aircraft Noise Management, 2008	Noise	Continue the noise monitoring at the existing monitoring network managed by FTA and the disclosure of the measurements results on FTA website	FTA	During operation	Noise measurement results, noise-related grievances, AESR and IESC report	
3.6-1	3	EBRD PR3 IFC PS 3 Turkish Groundwater	Water	Develop Water Management Plan which includes groundwater management, storm water management,	FTA	30/04/2025	Water Management Plan for operation	

		Law No. 167		water demand, permitting requirements, monitoring requirements and mitigation measures for operation phase				
3.6-2	3	EBRD PR3 IFC PS 3 Turkish Groundwater Law No. 167	Water	Conduct regular water quality analysis for all wells against lenders' requirements including EU regulations and any required corrective actions are implemented. Conduct regular groundwater table monitoring including groundwater abstraction rates and changes in water levels in the established monitoring network. to ensure potential impacts on third party water users are identified.	FTA	annual	Water Analysis results (annual reserve monitoring, semi-annual water analysis results), AESR and IESC report	Critical
3.7-2	3	EBRD PR3 IFC PS 3	Wastewater	Develop operational Wastewater Management Plan in line with the national requirements, Lenders' Environmental and Social Standards and measures identified in the ESIA Report	FTA	30/04/2025	Operation Wastewater Management Plan in place	
3.7-5	3	EBRD PR3 IFC PS 3	Wastewater	In line with the operational Wastewater Management Plan, Wastewater analysis of existing and new WWTPs to be tested and reported against requirements of both national and Lender's Environmental standards, including EU Urban WW directive.	FTA	annual	Wastewater Analysis results, AESR and IESC report	
3.8-1	3	EBRD PR3	Waste	Develop Waste	FTA	30/04/2025	Operational Waste	

		IFC PS 3 EU Waste Directive		Management Plan for operation activities in line with Lender's E&S requirements, including but not limited to current waste amounts/volumes and expected waste quantities after the expansion of airport and to monitor and record estimated and actual waste volumes as well as to define waste treatment/disposal options and disposal routes			Management Plan	
3.8-2	3	EBRD PR3 IFC PS 3 EU Waste Directive	Waste	In line with the Waste Management Plan, ensure that the waste logs in the hazardous waste storage area kept regularly and the entry and exit dates of the wastes are recorded on the site	FTA	31/03/2026	Waste logs, AESR and IESC report	
3.8-5	3	EBRD PR3 IFC PS 3 EU Waste Directive	Waste	Increase the amount of recycled waste (by 2% reduction year on year from a baseline of the first year of operation) and decrease the amount of waste per PAX	FTA	First five years of operation	Waste logs, Waste KPIs, Audit Reports, AESR and IESC Report	
3.8-6	3	EBRD PR3 IFC PS 3 EU Waste Directive	Waste	Conduct audit against ICAO Waste Management at Airports Eco Airport Toolkit for operation phase	FTA	30/06/2025	Audit Reports	
3.9-1	3	EBRD PR3 IFC PS 3	Soil	Ensure that all the tanks storing hazardous materials related with the activities of FTA have secondary containment structures	FTA	31/03/2025	Secondary containment structures established	
3.9-2	3	EBRD PR3 IFC PS 3	Soil	Secure hazardous material and hazardous waste compulsory liability	FTA	Before Start of operation	Hazardous material Inventory, Hazardous	

				insurance			materials liability insurance	
3.9-4	3	EBRD PR3 IFC PS 3	Soil	FTA will make efforts commensurate with their control and influence to initiate the process and cooperate with DHMI and the existing fuel farm operators to conduct leakage test and soil quality analysis in the farm locations and identify corresponding mitigation measures in line with GIIP a) before decommissioning of the fuel storage tanks around the existing fuel farm if the decommissioning is managed by FTA b) prior to further construction works if the decommissioning is undertaken by third party independent of FTA	FTA to initiate the process and cooperate with DHMI & fuel farm operators to conduct leakage test and soil quality analysis	(a) Before decommissioning of the existing fuel storage tanks / (b) prior to further construction works 31/03/2026	Soil quality analysis reports	
3.9-5	3	EBRD PR3 IFC PS 3	Soil	FTA will make efforts commensurate with their control and influence to initiate the process and cooperate with DHMI so that the existing fuel farm decommissioning activities are to be undertaken in line with regulation (Number 27605) Control of Soil Pollution stemming from Single Point Resources, regulation (Number 26005) on Control of Pollution Caused by Hazardous Substances in Aquatic	ATS & DHMI	Before decommissioning of the existing fuel storage tanks 03/31/2026	Soil quality analysis reports	

				Environment and regulation (Number 28257) on the Protection of Groundwater against Pollution and Deterioration to avoid contamination of soil and groundwater. A decommissioning plan aligned with good international practice will be prepared and submitted for LTA review if DHMI mandates FTA to decommission the existing Fuel Farm.				
4.3-1	4	EBRD PR4 IFC PS4	Infrastructure, Building, Equipment Design and Safety	Commission and independently certify a Life and Fire Safety (L&FS) Master Plan for the new terminal in line with local regulations and lenders' standards.	FTA & ATS &External Consultant	31/03/2025	Independently Certified L&FS Master Plan for the new terminal	
4.3-2	4	EBRD PR4 IFC PS4	Infrastructure, Building, Equipment Design and Safety	Conduct a third-party Life and Fire Safety Audit for operation phase including existing terminals and implement any resulting corrective actions.	FTA	31/03/2025	Third-party Life and Fire Safety Audit Report	
4.3-3	4	EBRD PR4 IFC PS4	Infrastructure, Building, Equipment Design and Safety	Conduct a leak test for the rooms equipped with gas suppression systems for fire-fighting purposes	FTA	31/01/2025	Gas suppression systems effectively in use	
4.3-4	4	EBRD PR4 IFC PS4	Infrastructure, Building, Equipment Design and Safety	Establish a periodical checklist and monitor the fire extinguishing system, accordingly.	FTA	31/03/2026	3rd party document / fire audit	
4.3-7	4	EBRD PR4	Infrastructure,	Establish a labelling system	ATS & FTA	31/03/2026	Tools and	

		IFC PS4	Building, Equipment Design and Safety	in parallel to the IDs provided in the tools and equipment inventory for operation and construction phases			equipment inventory, Labelling of tools and equipment	
4.4-3	4	EBRD PR4 IFC PS4	Hazardous Materials Safety	Develop a site-specific Hazardous Materials Management Plan for operation phase, including the interface with fuel farm operations	FTA	30/04/2025	Hazardous Materials Management Plan	
4.4-4	4	EBRD PR4 IFC PS4	Hazardous Materials Safety	FTA will make efforts commensurate with their control and influence to initiate the management of hazardous materials process and cooperate with DHMI and the existing fuel farm operators to integrate the plans	FTA	Prior to operation	Hazardous Materials Management Plan	
4.5-5	4	EBRD PR4 IFC PS4	Traffic and Road Safety	Develop a Traffic Management Plan for operation phase in coordination with DHMI. Deliver road safety awareness campaigns for sensitive receptors, with special focus on children and school staff. Undertake at least one road safety event / workshop at each identified school annually.	FTA & DHMI	30/04/2025 31/03/2026	Traffic Management Plans Safety Campaigns Records	
4.7-1	4	EBRD PR4 IFC PS4	Emergency Preparedness and Response	Update the Emergency Response Plan for operation in collaboration with DHMI. The ERP will include an Environmental, Health and Safety (EHS) Drill Plan.	FTA in corporation with DHMI & Fuel Farm Operator	01/03/2025	Revised Emergency Response Plans, AESR and IESC report.	Critical

				FTA will make efforts commensurate with their control and influence to integrate the fuel farm emergency scenarios.				
4.14-1	4	EBRD PR4 IFC PS4 Regulation on the Protection of the Employees from the Dangers of Explosive Atmospheres , Regulation on the Equipment to be Used in Explosive Atmospheres , Regulation on the Protection of the Buildings from Fire, Regulation on the Prevention of Major Industrial Accidents and the Mitigation of Their Effects	Process Safety	Make an assessment in accordance with, the Regulation on the Protection of the Employees from the Dangers of Explosive Atmospheres, the Regulation on the Equipment to be Used in Explosive Atmospheres and define ATEX requirements for equipment	FTA to initiate the process and cooperate with DHMI & fuel farm operators	before the new fuel farm is operational	Safety Report, Test Control Inspection Report, ATEX Equipment Conformity Reports, Explosion Protection Document, Major Accident Scenario Document, Major Accident Prevention Policy, Explosion Protection Document	Critical
4.14-2	4	EBRD PR4 IFC PS4 Regulation	Process Safety	Carry out tests, controls and inspections related to tanks, lines, pumps, basic process	FTA to initiate the process and cooperate	Before commissioning of the	Safety Report, Test Control Inspection Report,	

		on the Protection of the Employees from the Dangers of Explosive Atmospheres , Regulation on the Equipment to be Used in Explosive Atmospheres , Regulation on the Protection of the Buildings from Fire, Regulation on the Prevention of Major Industrial Accidents and the Mitigation of Their Effects		control systems, emergency stop and safety systems before commissioning of the new tanks	with DHMI & fuel farm operators	new tanks	ATEX Equipment Conformity Reports	
4.14-3	4	EBRD PR4 IFC PS4 Regulation on the Protection of the Employees from the Dangers of Explosive Atmospheres	Process Safety	Follow EU-SEVESO directive requirements for design of fuel farm	FTA to initiate the process and cooperate with DHMI & fuel farm operators	before the new fuel farm is operational	Explosion Protection Document, Major Accident Scenario Document, Major Accident Prevention Policy, BEKRA Notification Screenshot, Explosion	Critical

		, Regulation on the Equipment to be Used in Explosive Atmospheres , Regulation on the Protection of the Buildings from Fire, Regulation on the Prevention of Major Industrial Accidents and the Mitigation of Their Effects					Protection Document	
4.14-4	4	EBRD PR4 IFC PS4 Regulation on the Protection of the Employees from the Dangers of Explosive Atmospheres , Regulation on the Equipment to be Used in Explosive Atmospheres , Regulation on the	Process Safety	Application of EI standard 1540 during new fuel farm design stage	FTA to initiate the process and cooperate with DHMI & fuel farm operators	Before commissioning	Design Drawings	

		Protection of the Buildings from Fire, Regulation on the Prevention of Major Industrial Accidents and the Mitigation of Their Effects						
4.14-5	4	EBRD PR4 IFC PS4 Regulation on the Protection of the Employees from the Dangers of Explosive Atmospheres , Regulation on the Equipment to be Used in Explosive Atmospheres , Regulation on the Protection of the Buildings from Fire, Regulation on the Prevention of Major Industrial	Process Safety	Undertake QRA before the construction starts. Results of QRA to be submitted for independent review and acceptance by LTA. FTA will make efforts to ensure that the results of the independent audit i.e. any identified mitigation measures related to the design or operational procedures, are implemented before fuel farm becomes operational.	ATS & External consultant (geologist/hydrogeologist and process safety engineers)	before the new fuel farm is operational	Test Control Inspection Report	Critical

		Accidents and the Mitigation of Their Effects						
4.14-6	4	EBRD PR4 IFC PS4 Regulation on the Protection of the Employees from the Dangers of Explosive Atmospheres , Regulation on the Equipment to be Used in Explosive Atmospheres , Regulation on the Protection of the Buildings from Fire, Regulation on the Prevention of Major Industrial Accidents and the Mitigation of Their Effects	Process Safety	Conduct audit against Seveso Directive prior to commissioning of new fuel farm and at operational stage	FTA to initiate the process and cooperate with DHMI & fuel farm operators	During operations, at a frequency commensurate with outcomes of the 2024 audit	Audit Report	
4.14-8	4	EBRD PR4 IFC PS4 Regulation on the	Process Safety	Prepare Process Safety Report and internal Emergency Plan for new Fuel Farm	conditional on Fuel Farm contractor (FTA/ATS)	before the new fuel farm is operational	Process Safety Report, Emergency Plan for fuel Farm	

		Protection of the Employees from the Dangers of Explosive Atmospheres , Regulation on the Equipment to be Used in Explosive Atmospheres , Regulation on the Protection of the Buildings from Fire, Regulation on the Prevention of Major Industrial Accidents and the Mitigation of Their Effects						
4.17	4	EBRD PR4 Voluntary Principles on Security and Human Rights	Security and Human Rights	Monitor and report on certification and training of security staff as per national legislation and voluntary principles on security and human rights. Provide additional trainings on human rights, communication, incident/crowd management, GBVH in addition to regular certification requirements	FTA/Security Contractor	31/03/2026	Training records, AESR and IESC report	

5.2-2	5	EBRD PR5 IFC PS5		Ensure support and prioritisation of vulnerable people as identified in the plan (for SLIP)	FTA	Q4 2027	Number of participating beneficiaries in housing and livelihood improvement activities as per implementation plan (in line with the Updated Entitlement Matrix attached to the loan agreement) including reporting on gender and vulnerability disaggregated data	Critical
5.2-3	5	EBRD PR5 IFC PS5		FTA will present monthly progress reports to sponsors who will review and track progress against the Updated Entitlement Matrix and provide feedback and support to the program to ensure SLIP objectives are met. FTA will prepare and submit quarterly progress reports as per the IESC template to lenders.	FTA	Q1 2024 - Q4 2027	Number of consultations held, Grievance records and closure, Quarterly Progress Reports (IESC template)	Critical

5.2-4	5	EBRD PR5 IFC PS5		FTA to undergo two independent assessments (for SLIP): 1) completion audit 3 years after the start of the SLIP implementation; 2) assess completion/extension of security of tenure assistance for 5 HHs, as relevant., including delivery of any corrective actions resulting from 1) and 2)	FTA	1)Q2 2027, 2) Q1 2029	Number of beneficiaries of housing and livelihood improvement activities as per implementation plan including gender and vulnerability disaggregated data	
5.2-5	5	EBRD PR5 IFC PS5		Continue to implement an effective consultation with PAPs and key stakeholders and manage grievance mechanism related to delivery of the plan (for SLIP), with an objective to improve accessibility of the benefits offered and raise awareness on cut-off dates.	FTA	Q1 2029	Records of consultation held feedback received and timely responded, grievance records, AESR and IESC Report	Critical
5.2-6	5	EBRD PR5 IFC PS5		Undertake an interim review of the SLIP, to reallocate budget and update the programs and deadlines based on first half year of implementation and needs assessment, issuing a revised program to spend the remaining budget as per the Entitlement Matrix (EM) which is attached to the loan agreement.	FTA	31/03/2025 (Condition of First Disbursement)	Interim review report satisfactory to lenders. Updated Entitlement Matrix cleared by lenders and attached to the loan agreement.	Critical
10.2	10	EBRD PR10 IFC PS1		Update the SEP and community grievance mechanism considering the	FTA	31/03/2025	Detailed stakeholder list, SEP disclosed	

				operation phase risks and activities (noise, ramp-up, SLIP etc.) and disclose appropriately.				
10.3	10	EBRD PR10 IFC PS1, PS2		Implement and monitor the updated Stakeholder Engagement Plan. The grievance mechanism will be communicated to all internal and external stakeholders including workers of the companies within the airport	FTA	During operation	Stakeholder Engagement Plan, Copy of Grievance Mechanism provided to the Lenders, Grievance log (gender disaggregated), IESC reports, AESR	
GS 2.3	11	EBRD PR4 EBRD and IFC Joint guidance on GBVH for Private Sector	Gender Smart Specific Actions	Update and revise content of inductions and HR trainings for employees of FTA and contractors to disclose GBVH Policy and raise awareness on Ethical code of conduct among employees. Work with operation contractors to update and revise their HR policies, inductions, training programs to include GBVH policy and ethical code of conduct.	FTA	31/03/2026	Updated induction and HR training contents, Training records	
GS 2.4	11	EBRD PR4 EBRD and IFC Joint guidance on GBVH for Private Sector	Gender Smart Specific Actions	Promote help lines/emergency lines in the airport for GBVH complaints and incidents. FTA will set a requirement for operation contractors to make the availability of help lines/emergency lines visible as part of their operations. FTA will prepare a standard	FTA	During construction and operation 31/03/2026	GBVH policy leaflets, LTA IESC and AESR reports, and external labour audit report	

				flyers language with a visual design and require the contractors to use them in their inductions, integrate awareness raising on GBVH in their training plans, corporate events and monitor distribution of leaflets and awareness raising activities. Publicize it in public spaces relevant to their area of operation.				
GS 2.6	11	EBRD PR4 EBRD and IFC Joint guidance on GBVH for Private Sector	Gender Smart Specific Actions	Monitor GBVH complaints and report on resolution to Lenders through semi-annual and annual monitoring reports	FTA	During operation	IESC LTA reports and external labour audit report.	

